on Reconsideration, ¶ 27. An arbitrarily short interval actually would harm collocation applicants, because they would not have a dependable date upon which to expect the collocation arrangement to be ready. This would disrupt their own plans for purchasing and installing equipment, as well as their plans to integrate the collocation arrangement with their other network construction plans and their overall marketing plans. The Commission can rely on the competitive impact to support a rule requiring collocation to be provided as soon as possible, but it has to develop a record to show that the interval it picks can be met with reasonable diligence. ***See, e.g.***, *Burlington Truck Lines, Inc. v. United States*, 371 U.S. 156, 168 (1962) (the court looks for a "rational connection between the facts found and the choice made."). That record simply does not exist in this proceeding. Indeed, the *Order on Reconsideration* does not cite a single fact to show that any incumbent local exchange carrier currently is able to provide collocation within the 90-day interval for all types of collocation requests.

Moreover, as noted above, arguments that competitors need extremely short collocation intervals to promote competitive entry are misplaced. As is shown the Maguire declaration, Verizon has completed hundreds of collocation arrangements where the collocator has yet to install any equipment for as much as a year or more. Moreover, carriers that seek collocation plan their network expansions far in advance because of the time needed to order equipment and construct outside plant. They are perfectly capable of timing their requests for collocation to coincide with these activities, which typically are carried out over far longer than a 90 day period.

There is no showing that the collocation intervals adopted by state commissions have prevented competitive local exchange carriers from being able to enter the market on a timely basis. On the contrary, as the Commission previously concluded in its New York 271 order, the opposite is true. Competitors have been able to enter and compete on a timely basis, and have done so on a massive scale, serving 2.5 million lines in New York alone, including a large number served using some or all of their own facilities.

Finally, the Commission cannot justify an arbitrary 90-day standard that no carrier meets, simply by finding that the carriers will just have to do better. ***See Order on Reconsideration***, ¶¶ 28-31. The record does not show that the incumbent local exchange carriers are acting inefficiently or have failed to apply their best efforts to meeting collocation requests, and the Commission does not offer any examples of how collocation could be provided any faster. It would be arbitrary and capricious to impose a standard that cannot be met, and then to subject carriers to enforcement action for failing to meet an impossible standard.

For these reasons, the Commission should modify its rule requiring all collocation applications to be completed in 90 calendar days. The Commission's longstanding policy of leaving collocation provisioning intervals to the state commissions is working, as demonstrated by the ongoing proceedings throughout Verizon's territory. States are actively investigating tariffs and SGATs filed by Verizon, and many are currently investigating collocation provisioning intervals along with other terms and conditions of collocation. The Commission should allow this process to continue to work at the state level, and it should apply a national standard only where a state has failed to act. If the

Commission adopts any interval, it should adopt the collocation intervals approved in New York, which not only allow more than 90 days for providing collocation in already-conditioned space, but which allow for additional time where necessary to condition space or to deal with special circumstances. The Commission granted section 271 approval in New York, in part, based on its finding that the intervals adopted by the New York commission were reasonable and that they were consistent with section 251 and the Commission's rules. ***See*** *New York Order*, ¶ 74. These standards are challenging, but achievable, and they provide the assurance the Commission seeks that competitive local exchange carriers will be able to obtain collocation on a timely basis.

In addition, the Commission should express the intervals in business days, rather than calendar days, as provided in the New York intervals. ***See*** New York Public Service Commission, Case 96-C-0036; Order to Resolve Complaint and Clarify ONA Order, Issued and Effective September 30, 1996. Employees and outside contractors do not work on weekends or holidays, and the costs that were used to develop collocation rates do not include overtime or expedite charges. As a result, tying intervals to calendar days would actually serve to increase the cost of collocation to competitors, and would actually be contrary to the Commission's objectives here. In particular, the Commission should amend the 10-calendar day interval by which the incumbent local exchange carrier must indicate its acceptance or denial of a collocation request. This interval would leave the carrier with only 6 business days to respond to a request that was submitted on a Thursday or Friday, and only five business days if that period contained a holiday. This would leave insufficient time to process the order, survey the requested collocation site,

determine the availability of facilities, develop a price quote, and perform other activities necessary to provide a meaningful response. By expressing the intervals in business days, the Commission could ensure that there would be adequate time to complete each collocation request.

III. The Commission's Collocation Provisioning Interval Should Not Apply Unless There Is No Interval In A State Tariff, SGAT, Or Interconnection Agreement.

The Commission should clarify and/or reconsider its requirements concerning when and how its collocation interval would apply. There is no need for the Commission to require the incumbent local exchange carriers to adhere to a national standard if an enforceable standard exists in the state, whether pursuant to a state-adopted rule or order, an effective tariff, a statement of generally available terms and conditions ("SGAT"), or an interconnection agreement. Nor should the Commission impose a standard where a state is currently considering the issue, either in an investigation of a pending tariff or in another proceeding.

The Commission's goal in adopting a collocation interval was to "fill the void" in cases where the states have not acted. *Order on Reconsideration*, ¶ 23. However, there is no void to fill if an enforceable interval already exists in a particular state or if the state is addressing the issue. A collocator can seek enforcement of an effective interval and it can seek a state decision imposing a shorter interval. For instance, if the interval is in a state rule or order, the collocator can petition the state commission to change the rule or to adopt a new order. Similarly, a collocator can challenge an interval that is

incorporated in a state tariff during the tariff approval process. If an interval is incorporated in an interconnection agreement or an SGAT, the collocator can invoke its rights under section 252 to seek state arbitration of the interconnection agreement or to participate in the state's review of the SGAT.

For these reasons, the Commission should modify or clarify its order to require an incumbent local exchange carrier to meet the Commission's collocation interval only if there is no enforceable interval in a particular state or if the interval is not subject to a pending proceeding in the state.

IV. Conclusion

For the foregoing reasons, the Commission should reconsider the collocation interval it adopted in the *Order on Reconsideration.*

Respectfully submitted,

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Attorney for the Verizon
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Of Counsel
Michael E. Glover
Edward Shakin

Dated: October 10, 2000

ATTACHMENT A

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of Minnesota, Inc. d/b/a Verizon Minnesota
Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Alaska Incorporated d/b/a Verizon Alaska
GTE Arkansas Incorporated d/b/a Verizon Arkansas
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.

ATTACHMENT B

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	CC Docket No. 98-147
And	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	CC Docket No. 96-98

Declaration of Karen A. Maguire

1. My name is Karen A. Maguire. I am the Executive Director, Customer Infrastructure Program Management, in Wholesale Services for Verizon. In this position, I am responsible for meeting requests for collocation in Verizon central offices in all of the Verizon local operating companies. My organization receives and processes collocation requests from competitive local exchange carriers and arranges for the planning and implementation of collocation arrangements, based on the individual collocator's specific and unique requirements.

2. I present this declaration for the purpose of explaining the amount of time it takes to complete each of the activities necessary to provision collocation space and explaining why these activities typically take longer than the 90 calendar day interval prescribed in the Commission's *Order on Reconsideration*, released August 10, 2000 in CC Docket No. 98-147.

3. My testimony will focus on the work processes and the scope and magnitude of work required to complete each application once space conditioning is completed and space is available to house both the collocators' equipment and the network infrastructure to interconnect to Verizon. Mr. Carey's declaration will focus on the work activities and specific intervals encompassing the room construction, space conditioning and architectural requirements. Regardless of whether space conditioning or other special construction is required, it takes at least 76 business days, or approximately 105 calendar days, to provide fully functional collocation arrangements with 95% or better on-time performance. When space conditioning or special construction is required, there are some activities that can be completed in parallel with space conditioning (e.g., engineering and design, ordering materials). However, the work required to deliver DC Power, cabling, and network infrastructure cannot begin until after the space is ready. At least fifteen (15) additional business days (or 21 calendar days), and often more, are required in those instances.

4. Collocators depend on Verizon to meet its due dates consistently in order to schedule the dates for their workers and vendors to install equipment in the collocation arrangements and to meet their commitments to their end users. While it is certainly possible to provide some collocation arrangements in 90 calendar days, it is not feasible to do so consistently, 95% of the time. Based on my experience with collocators, they would rather have realistic due dates provided to them that are consistently met rather than commitments that cannot be met with any degree of certainty.

5. Verizon has gained a vast amount of experience in provisioning collocation, having completed more than 14,973 collocation applications with an

additional 4,329 currently in progress. Verizon has maximized its process flows to deliver collocation in reasonable time frame despite large volumes of mostly unforecasted applications. Although intervals vary in different states, I will focus on the shortest interval – the 76-business day interval adopted by the New York Public Utilities Commission. All of the intervals in the following paragraphs are expressed in business days, because Verizon's employees and contractors do not normally work on weekends and holidays. If Verizon and its vendors were required to work through weekends and holidays there would be an increase in costs and rates.

6. The 76-business day interval, which has been approved by the New York Public Service Commission and which has been found reasonable by the Commission in its review of the Bell Atlantic's section 271 application, can be extended to account for deviations from the norm. The established norm is that there is sufficient conditioned space to satisfy the collocation application, that the collocator has properly forecast its requirements, that no special construction is required, and that the vendors can support the workload.

7. While these exceptions do allow an extension of the interval, of the 1,466 collocation applications that Verizon completed in New York through August of this year, the average date given to the collocator was 82.42 business days, and the average completion interval was 78.54 business days. This demonstrates that the exceptions to the 76-business day interval do not cause unreasonable delay in provisioning collocation, but that a failure to allow for such exceptions would make it impossible for a local exchange carrier to meet the prescribed interval, even if it were longer than the 90 calendar day interval in the *Order on Reconsideration.* Indeed, both the New York PSC

and the Commission have recognized Verizon's ability to meet its collocation requirements by approving Verizon's section 271 application in New York.

8. While the remainder of this affidavit explains the end-to-end process of providing collocation in detail, it is important to note that for a good number of the critical path items Verizon relies on outside vendors. In general, vendors may be used to provide detailed engineering specifications for a job, furnish materials, and perform installation services. Across Verizon, the practice of using vendors varies based on the history and evolution of its local telephone companies and union contracts. Specifically, for detailed engineering specifications, the former Bell Atlantic states typically use vendors, while the former GTE states typically use internal resources. Throughout Verizon, we rely on vendors to provide materials, as Verizon is not a manufacturer. For installation, the former Bell Atlantic states in New England are under a contractual obligation to use their own unionized forces for installation, while the rest of the former Bell Atlantic states use external vendors. In the former GTE states, Verizon uses a combination of internal and vendor resources for installation. Regardless, in every single job vendors are used to provide part of the collocation build.

9. Verizon recently surveyed its vendors about their ability to provide these services under current conditions. Our interval below allows 4.4 weeks for the engineering of the job and delivery of equipment. In most cases, our vendors indicated that this is not enough time to allow ordering and delivery of materials on a consistent basis. They cited significant industry-wide delays in obtaining two materials – battery strings and fiber cables. One vendor stated that "material intervals from OEM's (original equipment manufacturers) have become extremely critical. Due to the nationwide

network build, even common parts are running 6-12 weeks." The schedule below also allows 4.4 weeks for installation of the equipment. The vendors estimated that this would take from 2 to 6 weeks (with 2 weeks indicating perfect conditions). A number of vendors point to a critical need for accurate forecasting to ensure timely completions. These vendor responses demonstrate why it requires a good deal of negotiating and working with our vendors in order to meet the 76 business day interval, and why extensions beyond the standard interval are often required.

10. While the collocation provisioning processes vary slightly among the states, the following discussion applies to New York as an example. The starting date for the applicable collocation interval(s) is the date that a collocator submits a completed application. Although there are only two Verizon milestones that are tracked and measured under the collocation intervals in the applicable tariffs or interconnection agreements; (1) the response letter from Verizon notifying the collocator of Verizon's ability to accommodate the collocation request (due on day 8) and (2) the completion date (typically on day 76), there are many other internal milestones that must be met in order to complete a collocation arrangement. Timeframes for completion of these other milestones may vary. Overall intervals depend upon individual building conditions and the scope of work needed to meet the request. In addition, the intervals provided assume no vendor delays, that there is adequate capacity in the network (*e.g.*, distribution frame capacity and DC Power), and that there are no unforecasted spikes in demand.

11. The following are the major milestones tracked by Verizon in constructing a collocation arrangement. Those labeled as "critical path" must be completed prior to

the next milestone commencing. Milestones not labeled as critical path can occur in parallel with other activities. The major milestones are:

a. Receipt and review of completed application (critical path)
b. Input application into database and distribute (critical path)
c. Issue letter of acknowledgment to collocator
d. Schedule and conduct site survey (critical path)
e. Issue Collocation Request Response Form (an internal document from the Local Collocation Coordinator to the application processing group describing if the request can be met and under what conditions) (critical path)
f. Issue response letter to collocator
g. Issue Capacity Creation Request to the Field Engineer specifying the quantity and type of terminations required (critical path)
h. Collocator notifies Verizon of intent to proceed and submits 50 percent down payment
i. Issue Telephone Equipment Order for detail engineering, material/equipment purchase and installation (critical path)
j. Complete detailed engineering/installation specifications and order and deliver material/equipment (critical path)
k. Start installation (critical path)
l. Written notification to the collocator to schedule the Collocation Acceptance Meeting and provide Connecting Facility Assignments

m. Update inventory systems (critical path)

n. Complete installation (critical path)

o. Review pre-acceptance checklist to ensure job has been completed and quality standards have been met (critical path)

p. Collocation Acceptance Meeting with Verizon and the collocator

q. Initiate billing

12. The following paragraphs provide an explanation of the milestones identified above and describe what associated tasks must be completed for each collocation arrangement. Many of these steps must be completed before the next task can be started, others are accomplished in parallel where Verizon is able to do so. Attachment A provides a flow chart for these activities. While the work may vary with each type of collocation arrangement, the following activities are consistent among the majority of all arrangements. It is important to note that removal of a step, even from the critical path, does not support a day-for-day reduction in the overall interval, as many activities are performed in parallel. Below, reflected in business days, are the critical milestones as well as the supporting activities that are involved in processing each collocation application.

13. **Receipt and review of completed application (Day 1 – critical path).** When the application is submitted, the application processing group must review it for accuracy and completeness to ensure that there is sufficient technical information for a site survey to be conducted. This includes verification that all required fields on the application have been completed. In addition, Verizon determines that the requested

cable terminations, power requirements and space requirements are supported by the amount of equipment the collocator is planning to install. A safety standard conformance review must also be done for the equipment the collocator is installing. This requires verifying that the equipment on the application (including plug-ins) is already included on the list of equipment that has been certified for compliance with the applicable safety standards in the Network Equipment and Building Specifications ("NEBS"). For equipment that is not on this list, the application processing group must ensure that the necessary NEBS paperwork/checklist has been submitted to the appropriate Verizon department.

14. **Input application into database and distribute (Day – 1 critical path).** Once the application has been determined complete, the application is date stamped and logged into the Collocation Database. The Collocation Database is used by various work groups within Verizon to track internal critical milestones throughout the implementation phase. The application is then distributed to Customer Network Engineering – Regional, the Local Collocation Coordinators, and the collocator's Project Manager. Local Collocation Coordinators work in the engineering group, and each is assigned a group of Central Offices for which they act as the general contractor, ensuring individual jobs are complete. Customer Network Engineering is a centralized group within engineering that manages the Local Collocation Coordinators' activities. Each collocator is assigned a Project Manager within Wholesale Services that is responsible to work with the collocator on its total network build, coordinating among the various Local Collocation Coordinators.

15. **Issue letter of acknowledgement to collocator (by Day 5).** Once the technical review has been completed and prior to distributing a letter of acknowledgement to the collocator, there must also be a review and verification that the administrative fields on the application contain the necessary information. This includes verification of the tariff under which the application is to be processed, collocator billing information, collocator vendor information, requirements for Certificates of Insurance, and requests for the establishment of Special Billing Numbers. When this is complete, a letter is sent to the collocator acknowledging receipt of a completed application. Subsequently, Billing Account Numbers (BANs) are established in the billing systems and the application fee/deposit processed.

16. **Schedule and conduct site survey (by Day 7 – critical path).** To determine whether a request for collocation can be accommodated, Verizon must schedule and conduct a survey of the central office where the collocator has requested collocation. This requires a detailed review of the application by the engineering organization to identify the specific space, power and cabling requirements and distribution of the application to all appropriate Verizon personnel (Real Estate, Operations, Central Office Engineering, Outside Plant, Security, etc.) whose input will be required at the site survey. A joint site survey is scheduled for all organizations whose attendance is required to determine the scope of the work, which varies by the job. At the site survey, the specific conditions of the central office are reviewed to determine how to meet the individual collocator's request. This includes identifying the available physical space where the collocation arrangement will be placed, capacity of the fiber, DS3, DS1 and Voice Grade distributing frames and terminal blocks or panels, capacity/placement of

the point of termination, capacity/availability of cable racking, capacity in the existing power plant and power distribution systems and any additional heating, ventilation and air conditioning requirements that may be driven by the heat generated by the collocator's equipment. In addition, the team must review the collocator's specifications/design criteria and evaluate the impact on Verizon-provided supporting infrastructure, which includes the DC Power, distribution frames, and network cable support. In some cases, Verizon will have to augment power plant capacity, distribution frame capacity, and network infrastructure. Note that expansion of Verizon's infrastructure depends on the specific and unique requirements of the collocator's request, and as such cannot usually be done in advance. While these activities are occurring, Customer Network Engineering also identifies any non-forecasted spikes in demand and communicates this within the organization to modify existing workloads. Common Language Location Identifier ("CLLI") Codes, Geographical Location Codes, and Access Customer Terminal Locations are established and updated as necessary in the Collocation Database as well as other Operational Support Systems to identify the facilities that will connect to the collocation arrangement.

17. **Issue Collocation Request Response Form to Application Processing (by Day 8 – critical path)**. The preliminary site survey results are then compiled by the Local Collocation Coordinator and provided to the application processing group via the Collocation Request Response Form. This form includes a space/no space determination, dimensions of the physical space or number of relay racks that can be accommodated, size variance from the application, establishment of the project schedule, and any other unusual conditions associated with the collocation build that could impact the collocator.

If conditioned space is not readily available, or if the central office is at or near capacity, this aggressive schedule does not always allow for a thorough review of potential building renovations or rearrangements that can be accomplished to make space available. Under these conditions, Verizon is permitted to take an additional 20 days to perform a detailed review.

18. **Response Letter to collocator (by Day 9).** A letter outlining space availability and square footage, dimensions, a price estimate for non-recurring charges, any unusual conditions, and a schedule for completion is sent to the applying collocator. Although this item is not technically a critical path in building the arrangement, to complete this step the interdepartmental team must have completed the preliminary review of the central office as described above and have made a determination that the request can be accommodated. This includes evaluating the network equipment and supporting infrastructure, determining the preliminary engineering requirements of the specific application, developing the appropriate price quotes, and establishing a completion schedule. All of this work must be completed before any detailed engineering necessary to actually build the arrangement can begin.

19. **Issue Capacity Creation Request (by Day 14 – critical path).** The results of the site survey are incorporated into the Capacity Creation Request and sent to the Field Engineer to initiate the engineering of the job. This requires specifying the amount of space that will be allocated to the arrangement, the number of DS1s, DS3, Voice Grade, Line Sharing and Fiber Terminations to be provisioned, as well as the amount of DC power required. The service date (date by which the application must be completed) is also noted as well as any unusual requests from the collocator. Also, there

is a review of requirements for additional Verizon-provided equipment for both common area network and network interface. The Capacity Creation Request is distributed and notification is given to departments responsible for Power, Space & Frame, Real Estate, Central Office Engineering, Interoffice Facility/Digital Cross Connect System, and Outside Plant to issue orders for the detail engineering to be performed, material to be ordered and installation services to be contracted. During this period, the Local Collocation Coordinator also may consult with the collocator to verify final requirements in circumstances where clarification is required or if the space available does not accommodate the all of the collocator's first choice parameters.

20. **Collocator Notifies Verizon of Intent to Proceed and Submits 50% down payment (by Day 14).** Once the collocator is notified that its request can be accommodated, it must agree to proceed and submit a down payment. At a minimum, an agreement to proceed and promise of payment must be made. Collocators with a history of payment problems may be required to pay before further work begins.

21. **Issue Telephone Equipment Order (by Day 28).** Once a Capacity Creation Request is received from Local Collocation Coordinator (including funding source), the Engineering Center issues a Request for Quote to vendors for bids to perform the detailed engineering, develop the installation specifications, identify and order the necessary equipment and material needed for the job, and install the facilities. In order for the vendors to respond to the Request For Quote, they must visit the central office and determine all of the efforts necessary to construct the collocation arrangement. As soon as the vendors submit the Requests for Quote to Verizon, they are reviewed and a vendor is selected. Verizon must also update its Operating Support Systems to ensure

that the collocator's arrangements and terminations are included. These Operating Support Systems include the automated Trunks Integrated Record Keeping System, Switch, and Loop Facility Assignment Control System. Finally, a Telephone Equipment Order is sent to the selected vendor(s) authorizing the work to be performed..

22. **Detailed Engineering, Installation Specifications, Ordering and Receipt of Material (by Day 50 – critical path).** The Verizon-approved vendor engineers the job, develops the installation specification, and orders all necessary equipment and cabling, and populates the Operating Support System that tracks the Telephone Equipment Order. Prior to ordering any materials, the vendor must detail every aspect of the installation effort. This includes identifying the specific location of the arrangement, location of point of interconnection with Verizon's facilities, fuse positions on the Battery Distributing Fuse Bay (where the collocator draws power), type and location of each termination panel for DS3, DS1, voice grade, line share and fiber cables, exact location and route for all cable runs (cable must be run from the various Verizon termination panels to the point of termination bay), addition of cable racking and opening of cable holes. Once this has been completed, the materials are ordered and equipment is shipped to warehouses. While the material is on order, the installation specifications are developed and provided to the installation vendor. Once all the materials have been received in the warehouse, the installation effort can begin. The vendor provides to the Verizon Vendor Management/Central Office group the detailed Method of Procedure, which details the actual work that will be performed in the central office.

23. **Installation Starts (by Day 53 – critical path).** Installation starting by day 53 assumes that all real estate/site conditioning has been completed. All activities up until this point can be performed in parallel with real estate/site conditioning work, if required, as described in Mr. Carey's affidavit. The installation vendor follows the Method of Procedure and delivers all installation materials and specifications. The Method of Procedure is a standard telephone company practice by which the installer meets with the local central office personnel to go over the installation job in detail, including scheduling, quality requirements, etc. Because much of the activities being done by the installation vendors will occur in and around Verizon's working equipment, some of the activities to terminate cables must be done in Safe-Time hours (i.e., late evening to early morning).

24. **Written Notification to the Collocator to Schedule the Collocation Acceptance Meeting and provide Connecting Facility Assignments (Two weeks prior to due date).** Confirm existence of Connecting Facility Assignment forms and verify that that the information supplied matches the information in the collocation application. Once this has been completed, the form(s) are attached to the Collocation Application and the collocation databases are updated. It is then verified that the data was input into the Operation Support Systems for Trunks Integrated Record Keeping System, Switch, and Loop Facility Assignment Control System; and that fiber cable installation is complete. Connecting Facility Assignment (otherwise known as tie-down information) is then provided to the application processing group, which sends this information to the collocator along with the notice that the job is nearing completion and that the parties need to schedule an acceptance meeting. A walk-through is scheduled

with the collocator to occur on the job completion date or later, at the collocator's preference.

25. **Update Inventory Systems (prior to due date -- critical path).** The vendor is responsible for updating the Operating Support Systems with proper cable assignment information with Equipment Inventory Utilization data. This information is not available until two weeks prior to overall completion of the job and is the trigger for Verizon to update all the appropriate Operating Support Systems to identify the various types of connectivity to the collocator's arrangement. The cable information is then forwarded for input to Trunks Integrated Record Keeping System, Loop Facility Assignment Control System, and Switch systems. Switch Provisioning receives the Switch Input form and Connecting Facility Assignment requirements. The Switch inventory is then built. The Facility Management Center receives the Loop Facility Assignment Control System Form from Connecting Facility Assignment for requirements. Once the Facility Management Center verifies the Loop Facility Assignment Control System information (i.e., cable identification, count, collocator, etc.), they populate data for cable identification, count, terminal, loop makeup, etc. The Facility Management Center then forwards an input request to the Loop Facility Assignment Control System staff. After the Loop Facility Assignment Control System staff receives the request, they ensure the information is complete and correct. The Input Group is then sent the request and a Script is built. The Input Group runs an input request and Facility Management Center and Loop Facility Assignment Control System review cable identification and count to confirm they are correct and complete. The

Loop Facility Assignment Control System Form, now in Lotus Notes, is completed and dated. Engineering verifies.

26. **Installation Complete (by Day 74 – critical path).** The installation vendor is responsible for installing all aspects of the job by this date. This includes running and termination of all cables, installation and termination of power feeds, cable racking, and termination blocks at the point of termination) bay (if ordered by the collocator) and distribution frames.

27. **Pre-Acceptance Checklist (by day 76 – critical path).** This quality review may be performed by company personnel or by a vendor hired by the Local Collocation Coordinator. The quality reviewer provides the vendor with the Telephone Equipment Order, Collocation Application, Floor Plan, and checklist. The quality reviewer then performs a checklist confirmation and provides feedback regarding conformances and non-conformances to the responsible parties. Field Engineering, Vendor Management, and Real Estate will then contact the Installation Vendor to have the non-conformances corrected. Once the non-conformances have been corrected by the Installation Vendor, Field Engineering, Vendor Management, and Real Estate, the quality reviewer independently verifies the corrections.

28. **Collocation Acceptance Meeting with Verizon and the Collocator.** When the job is complete, the Local Collocation Coordinator conducts a walk-through and job acceptance with the collocator.

29. **Billing Initiated as of Collocation Acceptance Meeting or 30 Days after completion, whichever is earlier**. The arrangement is verified as built. All funds are transferred from the collocator's holding account as appropriate. All Universal

Service Order Codes and quantities are identified and confirmed. The Universal Service Order Codes and quantities are then input into Carrier Account Billing System. Confirm that the Carrier Account Billing System is billing appropriately and file all appropriate documentation. Claims, questions, and collections for the account are then handled.

30. The foregoing demonstrates that there are numerous steps that must be completed before collocation space can be provisioned and turned over to a collocator. Each collocation request is custom designed, because each central office is different, and because the collocator determines the type of collocation arrangement (amount of space, type of entrance, type of facilities to be connected, etc.). In addition, much of the interval is outside of Verizon's control – primarily the shipment of materials and performance of construction work by outside vendors.

31. As discussed earlier, this schedule assumes that space is already conditioned and that there are no major construction obstacles or special applicant requirements. In addition, raw space conversions fall outside the normal interval and are negotiated on an individual case basis with outside vendors. Verizon uses its best efforts to minimize the additional time required to complete the conversion and informs the state public service commission and the collocator of the time intervals. It also assumes that there is no unusual volume of demand from the same collocator or from a group of collocators in the same office and that applications have been properly forecast.

32. The *Order on Reconsideration* adopted a shorter interval than has been adopted in any state because some collocators had complained that undue delay in obtaining collocation was harming competition. In Verizon's experience, this concern is not justified. As is shown above, Verizon has provided collocation on a timely basis. In

addition, the Commission should note that the need for shorter intervals is contradicted by the length of time that collocation arrangements in the Verizon region have remained empty after Verizon turned over the arrangements to the collocators. The following chart shows that many collocation arrangements have remained idle for as long as a year with no activity by the collocator.

VACANT COMPLETED COLLOCATION SPACE

VERIZON EAST

SEPTEMBER - OCTOBER 2000 SURVEY

State	Total Sites Compl Physical Scope CCOE	Total Compl Sites SURVEYED	% SURVEYED	0-3 months	3-6 months	6-12 months	> 12 months	TOTAL
CT	13	13	100.00%	0	0	0	0	0
DC	176	160	90.91%	4	27	11	4	46
DE	67	41	61.19%	3	4	2	1	10
MA	1623	833	51.32%	9	89	55	31	184
MD	847	792	93.51%	34	217	50	16	317
ME	147	83	56.46%	1	14	14	2	31
NH	201	95	47.26%	0	9	5	5	19
NJ	1140	1039	91.14%	127	191	57	16	391
NY	2206	1003	45.47%	12	85	46	44	187
PA	1342	1106	82.41%	74	198	138	22	432
RI	187	153	81.82%	10	12	30	19	71
VA	679	637	93.81%	34	86	29	7	156
VT	50	26	52.00%	0	6	2	0	8
WV	63	0	0.00%					0
TOTAL	8741	5981	68.42%	308	938	439	167	1852

Percent total sites inventoried with no working equipment: 30.96%